

Exhibit “D”

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, ss

MIDDLESEX SUPERIOR COURT
DEPT. OF TRIAL COURT
C.A. NO.

ADMIRAL METALS SERVICENTER CO. INC.,
Plaintiff

v.

FEUZ MANUFACTURING, INC.
And
GARY A. FEUZ, INDIVIDUALLY
Defendants

And

GENERAL ELECTRIC COMPANY
And
EMPIRE RECYCLING OPERATIONS, INC.
Reach and Apply Defendants

PLAINTIFF'S MOTION FOR INJUNCTION

Now comes the Plaintiff, Admiral Metals Servicenter Co., Inc., and hereby moves pursuant to Mass.R.Civ.P. 65 for an order enjoining the Defendants, Feuz Manufacturing, Inc., and Gary A. Feuz, individually (collectively, the “**Defendants**”), and Reach and Apply Defendants, General Electric Company and Empire Recycling Operations, Inc. (“**Reach and Apply Defendants**”), in accordance with prayers for relief 3 and 4 in the Verified Complaint, as set forth below:

1. That this Court adjudicate that Defendants, their agents, servants, employees, attorneys, representatives, or others acting on their behalf, are enjoined and restrained from transferring,

selling, assigning or in any other way disposing of their inventory, equipment, fixtures, accounts receivable proceeds thereof or any other assets outside the ordinary course of business.

2. That this Court adjudicate that the Reach and Apply Defendants, their agents, servants, employees, attorneys, representatives, or others acting on their own behalf, now or in the future are:

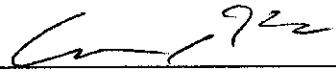
- a. Restrained and enjoined from paying monies due to Defendants;
- b. Ordered to pay all monies due to Defendants to Plaintiff until such time as the debt from the Defendants to the Plaintiff is satisfied in full, so that such payments are thereby reached and applied to Defendants' debt to the Plaintiff, until the Outstanding Amount is satisfied.

As grounds for this Motion, Plaintiff incorporates by reference the facts set forth in the Verified Complaint filed in this action, which demonstrates that the Plaintiff is likely to prevail on the merits of its claim against the Defendants.

Further, Plaintiff would be irreparably harmed if Defendants' assets were not preserved to be available for Plaintiff to satisfy a judgment against Defendants because, upon information and belief, Defendants are insolvent and have neither sufficient funds on hand to satisfy such judgment nor any insurance applicable to Plaintiff's claim. Finally, the balance of equities favoring the granting of this Motion, in that the temporary limitation on Defendants' property rights as requested herein is minimal in comparison to Plaintiff's potential harm.

WHEREFORE, Plaintiff respectfully requests that this Court issue a preliminary injunction.

Plaintiff
By its attorneys,



Howard S. Goldman
BBO# 199030
Cameron C. Pease
BBO# 561906
Goldman and Pease
160 Gould Street
Needham, MA 02494
781-292-1080

Date: October 8, 2004

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